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Jennifer Ybarra



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From: Paul Green [pgreen@tucsonaudubon.org]
Sent: Wednesday, March 24, 2010 7:30 AM
To: Newman-Web; Pierce-Web; Mayes-WebEmail; Kennedy-Web; Stump-Web
Cc: 'Christina McVie'; 'Herb Trossman'; lkennedy@audubon.org
Subject: 69kV SSVEC Line Objection
Attachments: SulfurSpringsMar23DT.pdf

Dear Chairman Mayes and Commissioners,

I attach a letter in opposition to the request by SSVEC for immediate installation of the 69kV line from Huachuca City to Sonoita through the Babacomari Ranch from Tucson Audubon.

Thank you for your consideration.

Arizona Corporation Commission

DOCKETED

MAR 29 2010

DOCKETED BY

Dr Paul Green
Executive Director | Tucson Audubon
Skype TAS-CEO | 520.777.9525 | Cell 520.235.1796 | Fax 520.623.3476

300 E University Blvd., Ste 120, Tucson AZ 85705

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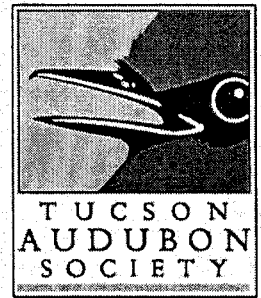
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ARIZONA CORPORATION COMMISSION
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23 March, 2010

Arizona Corporation Commission
Hearings Division
1200 West Washington
Phoenix, AZ 85007



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Main Office
300 E. University Blvd., #120
Tucson AZ 85705
TEL 520.622.5622
FAX 520.623.3476

Dr Paul Green
Executive Director
pgreen@tucsonaudubon.org
520.777.9525

Dear Chairman Mayes and Commissioners

Tucson Audubon respectfully requests that the Arizona Corporation Commission denies the request by the Sulphur Springs Valley Electric Cooperative (SSVEC) for immediate installation of the 69kV line from Huachuca City to Sonoita through the Babacomari Ranch. The strong-arm tactics employed by SSVEC Member Services Manager reduces still further the public's trust in this company. We would like to see full public answers to the questions posed by Mr Marshall Magruder, Commissioner Newman and others.

Tucson Audubon represents around 4000 member households, mainly in Tucson and Pima County. We have a vision of communities in southeast Arizona connected to their natural world through birds, and who use our natural resources in a sustainable manner. Since 1949 we have been working with all in the community to conserve natural resources for use and enjoyment by all.

We maintain our already expressed opinion that the proposed route of the new transmission line, along an easement owned by SSVEC that runs across the historic Babacomari Ranch just to the north of the Appleton-Whittell Research Ranch, would be destructive of a rare area of pristine desert grassland, worthy of careful consideration.

Tucson Audubon questions first whether this line is necessary, how would we know that it might be necessary, what makes this the preferable route and finally, what alternative solutions do we have to the supply issues suggested by SSVEC? Tucson Audubon maintains that the answers to each of these questions would have best been answered by an independent inquiry since there is a level of distrust between communities and the SSVEC. The "Independent Feasibility Study" appears to have relied solely on information supplied by SSVEC, without questioning the integrity of the data. Our strong recommendation remains that no further construction should take place until all questions raised by the public and the ACC are fully addressed.

The proposed new route for the power line trespasses along the site of valuable long-term research projects that compare elements of grazed lands with lands not grazed for more than 40 years. This is a unique situation that the line construction would disrupt. The construction and maintenance of the proposed new line will negatively impact many research projects, now and in the future, which may also inform of us of adaptation of critical regional systems to climate change.

National Audubon has revealed that grassland birds show some of the most dramatic declines in recent years as the result of the destruction of grassland habitats due to conversion to agricultural and human development. As a group, endemic grassland birds have shown a steeper, more consistent, widespread decline than any other guild of North

American bird species, by 40 percent over the past 40 years.

Tucson Audubon considers that the proposed line, in addition to being expensive, will have significant negative impacts and recommends, that ACC not grant SSVEC's request to immediately begin construction until all relevant questions have been answered.

1. Tucson Audubon recommends that SSVEC should investigate more rigorously alternatives including:
 - a. locally generated renewable energy,
 - b. back-up from neighboring electric utility companies,
 - c. back-up provided via emergency generators,
 - d. re-engineering the existing line from the Huachuca sub-station,
 - e. conservation and reduced consumption through education,
 - f. changes to county ordinances and codes to promote locally generated renewable energy.
2. While a number of Threatened, Endangered and Species of Special Concern live in the area to be impacted, no environmental or biological assessment of the impacts of this project has been made available for evaluation by the concerned public
3. The construction and maintenance activities will provide a corridor for invasive plant species, further degrading this rare native grassland habitat.
4. The project as designed is not consistent with the Santa Cruz County Comprehensive Plan largely because of negative scenic/visual aspects, and the failure by SSVEC to engage communities in collaborative solutions. Below are excerpts from *A User's Guide to A Comprehensive Plan for NE Santa Cruz County* Part II, Chapter 2 pg 4:
 - a. "Santa Cruz County, SCCF, and other local organizations and individuals should actively participate in power line siting, with a goal of ensuring that high voltage overhead power lines are not routed through NE Santa Cruz County, except as needed for local service." SSVEC has not shown that this line is needed for service, and has not allowed local participation in siting of this line.
 - b. "If a high voltage overhead power line is routed through NE Santa Cruz County, approval of the necessary permits should be contingent on mitigation of visual impacts by requiring the utility constructing the line to acquire scenic easements within the Open Space Framework established by this plan." SSVEC has not done this.

Appendix D. Open Space Framework: pg 16

- c. "Our community's Goal: Maintain the natural attractions of NE Santa Cruz County by preserving the remaining large patches of habitat and functional connections between those patches."

Appendix E. Visual Preference Survey (Pg 21)

1. Views of the Mustang Mountains from SR 82
2. Views of the Babocomari and Empire Ranches, both with and without mountains in the background

Conclusion (page 24)

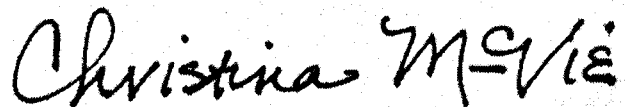
- d. "Residents and landowners in northeastern Santa Cruz County clearly place a high value on views of open (i.e. undeveloped, unfenced) grasslands, especially when mountains can be seen in the background. These include views of the Santa Rita and Mustang Mountains from both SR 82 and SR 83, as well as views of the Babacomari and Empire Ranches. Vistas of pastoral valley bottoms and oak woodlands are also valued."
5. Investment in the line guarantees continued reliance on energy generated from coal contributes to carbon emissions. Since grants are available to assist communities, residents, and businesses to shift to clean, renewable energy, is a more progressive approach.
6. The project proposed by SSVEC will cost at least \$13.5 million. Alternatives presented by the Renewable Energy Task Force (comprised of residents and experts in renewable energy) are significantly less (\$4.5 - 9 million) .
7. Costs of the power line as proposed will be borne by the members through a rate increase, probably to take effect in two years. Alternatives that use renewable energy are eligible for stimulus funds and other grants that will reduce the price even further than the up-front cost (which is already cheaper than the proposed power line).

Thank you for considering our request.

Sincerely



Dr Paul Green
Executive Director



Christina R McVie
Conservation Chair